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By the death of Edward Winslow Fox of the third-year class on September the eighteenth the editorial board of this Review has been decreased and its efficiency lessened. And bitter as this loss is to us — his friends — it has a wider significance, for no young man ever gave greater promise of a valuable life. He entered the Law School full of the best academic honors from Harvard College, and in the School his work was of the highest quality. He seemed curiously fitted for the law: he was careful, firm, of sound judgment, — in manner direct, convincing, and of rare dignity, — in all eminently judicial. His friends knew him as a man of absolute integrity and of great personal attractiveness. He would, it seems, have been a power in any community in which he lived.

THE LAW SCHOOL. — The Law School opens with a larger entering class than last year, — full statistics will appear in the December number. There are a few changes in the curriculum to record. Suretyship has become a two-hour course under the title of Suretyship and Mortgage. Massachusetts Practice will be given by Mr. E. R. Thayer in place of New York Practice. Damages, Patent Law, and Roman Law are omitted. Professor Ames has charge of Sales, and Assistant Professor Westengard of Property II. As was expected, Professor Williston resumes his class in Contracts after an interval of three years. Mr. Bigelow, LL.B., 1899, is assisting Professor Beale in Criminal Law. The Bail Courts for practice in pleading will be continued. Carriers and Admiralty under Professors Beale and Strobel respectively will together form a two-hour course. The increase in size of the School necessitates a more

extended division into sections of the classes. Property I, Property II, Torts, Contracts, Bills and Notes, and Evidence are divided into two sections; Pleading into three; and Criminal Law, as last year, into four.

THE DREYFUS CASE. — Alfred Dreyfus, a Jew, captain of the French artillery, in December, 1894, was convicted of a charge of treason by a court-martial, proceedings of which were not made public. Subsequently it has appeared that the conviction was largely based on the belief that Dreyfus was the author of the "*bordereau*," a document extracted from a waste-basket of a foreign embassy supposed to be in his handwriting. It announced the transmission of military information to the foreign government, is agreed to be authentic, and is clearly treasonable. It is understood that certain other documentary evidence — to be noted later — reinforced the belief in his guilt.

In January, 1898, the Dreyfusites brought to public trial Commandant Esterhazy — this again a military court-martial — on a charge of having written the "*bordereau*." One of the main points of the Dreyfusites was the similarity of Esterhazy's handwriting to that of the "*bordereau*." The theory of the defence was that it was written by Dreyfus, but that in attempting to avert suspicion he had imitated Esterhazy's hand — a curious inconsistency in the light of the line of proof which brought about the conviction of Dreyfus, for the "*bordereau*" was then, it seems, supposed to have been written by Dreyfus in his own hand. The court refused to allow the prosecution to give evidence or to make any reference to the Dreyfus trial to contradict that verdict, declaring it *chose jugée*. Naturally Esterhazy was acquitted. The conduct of the trial showed pretty clearly that the result was rendered under order, and the only point scored by the Dreyfusites was in showing — conclusively — that Esterhazy was a thorough-going rascal.

In 1898 Emile Zola received three trials and a final conviction in an action for libel for impeaching the justice of the Esterhazy court-martial. See 11 HARVARD LAW REVIEW, 539. These trials were important largely in that they brought to light certain portions of the evidence on which Dreyfus was originally convicted — and the thinness of it.

By this time the aspect of affairs had greatly changed. Through the efforts of one Colonel Picquart and the Dreyfusites it became clear that it was strongly probable that a certain amount of the evidence against Dreyfus had been manufactured to reinforce the original verdict, and again that this was done with the cognizance of some members of the general staff of the French army. In August, 1898, Colonel Henry, an ardent anti-Dreyfusite, and, through his official position as chief of the Secret Service Bureau succeeding Picquart, most prominent in the series of trials, committed suicide after arrest; but before his death confessed to having forged certain proof of Dreyfus's guilt, a document purporting to come from a foreign government referring to their connection with Dreyfus. The document had been used, though not shown, in the first Zola trial.

Not until after this did Dreyfus obtain a retrial. In the present year, at the petition of the Minister of Justice the Court of Cassation, the supreme court of criminal appeal in France, because of the presentation of new evidence reopened the Dreyfus case and finally decided on a new court-martial. (For a short description of the powers of the court of